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*Counsel for Plaintiff wedi Corp.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

WEDI CORP.,

Plaintiff,

v.

HYDROBLOK GRAND INTERNATIONAL  
LTD., HYDROBLOK GRAND  
INTERNATIONAL INC., and  
HYDRO-BLOK USA LLC,

Defendants.

Case No. 2:22-cv-00457-CDS-BNW

**STIPULATION TO EXTEND TIME TO  
RESPOND TO THE COMPLAINT AND  
ADMINISTRATIVE REQUEST TO  
WITHDRAW ENTRY OF DEFAULT  
(First Request)**

Plaintiff wedi Corp. (“wedi”) and Defendants Hydroblok Grand International Ltd. (“Hydroblok Grand Canada”), Hydroblok Grand International Inc. (“Hydroblok Grand Nevada”), and Hydro-Blok USA LLC (“Hydroblok USA”) (collectively, “Defendants”), hereby stipulate as follows:

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1           1.       Defendant Hydroblok Grand Canada was served with the Summons and Complaint  
2 on March 18, 2022, at its Registered Office in Canada. Pursuant to Fed. R. Civ. P. 12(a)(1),  
3 Hydroblok Grand Canada's response to the Complaint was due April 8, 2022. On April 13, 2022,  
4 wedi filed a Request for Default pursuant to Fed. R. Civ. P. 55(a) and LR 77-1(b)(2) with a  
5 supporting Declaration (Dkts. 15, 16).

6           2.       Defendant Hydroblok Nevada was served with the Summons and Complaint on its  
7 registered agent in Nevada on April 12, 2022.

8           3.       On April 14, 2022, John Denkenberger of the law firm Christensen O'Connor  
9 Johnson Kindness PLLC called Daniel Becka (one of wedi's lead attorneys) and advised him that  
10 Mr. Denkenberger's firm had just been retained to represent the Defendants in this case and was in  
11 the process of obtaining local counsel. Mr. Denkenberger requested that Hydroblok Grand Canada  
12 be given additional time to respond to the Complaint. Mr. Becka advised Mr. Denkenberger that the  
13 Summons and Complaint were out for service on the other two Defendants but suggested that if Mr.  
14 Denkenberger's firm would be entering appearances for all three Defendants after obtaining local  
15 counsel, Defendants should determine what additional time they would need to file responses for all  
16 three Defendants and wedi would try to accommodate them.

17           4.       On April 15, 2022, John Whitaker of the law firm Christensen O'Connor Johnson  
18 Kindness PLLC contacted Mr. Becka and offered to waive service on any unserved Defendants  
19 pursuant to Fed. R. Civ. P. 4(d) in exchange for 60 days from April 14 to respond to the Complaint.  
20 Mr. Whitaker also requested that wedi withdraw its request for default and allow Hydroblok Grand  
21 Canada the same time to file its response. Mr. Becka responded that wedi would agree to the 60-day  
22 extension for all three Defendants and that once the appearances were filed on behalf of the  
23 Defendants the parties could stipulate to the extension and wedi would withdraw its Request for  
24 Default.

25           5.       On May 2, 2022, F. Christopher Austin of the law firm Weide & Miller, Ltd. entered  
26 an appearance on behalf of the Defendants and Petitions for Admittance *Pro Hac Vice* were filed  
27 for Mr. Denkenberger and Mr. Whitaker. On May 4, 2022, Defendants' counsel requested that  
28

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Defendants be given 60 days from that date to respond to wedi's Complaint (i.e., by July 4, 2022), to which Mr. Becka agreed.

6. On May 10, 2022, the Court acted upon wedi's Request for Default and entered default against Hydroblok Grand Canada, Dkt. No. 23.

7. Pursuant to LR IA 6-1, the undersigned attorneys for Defendants state that this is the first request for an extension of time to respond to the Complaint and Defendants request this extension because, as noted above, counsel for Defendants were only recently retained and require additional time to respond.

8. Relatedly, wedi and Defendants collectively and respectfully request that the entry of default made as against Hydroblok Grand Canada on May 10, 2022, Dkt. No. 23, be withdrawn.

DATED this 13th day of May, 2022.

DATED this 13th day of May, 2022.

By: /s/ Daniel J. Becka

By: /s/ John Whitaker

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### ORDER

IT IS ORDERED that ECF No. 25 is GRANTED.

IT IS FURTHER ORDERED that Defendants must respond to Plaintiff's complaint by 7/4/2022.

IT IS FURTHER ORDERED that the Clerk's Entry of Default is VACATED, as the parties move to withdraw it.

IT IS SO ORDERED

DATED: 4:14 pm, May 16, 2022



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE